

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SCOTT L. BAENA, LITIGATION TRUSTEE
OF THE LERNOUT & HAUSPIE SPEECH
PRODUCTS N.V. LITIGATION TRUST,

Plaintiff,

v.

KPMG LLP and KLYNVELD PEAT
MARWICK GOERDELER
BEDRIJFSREVISOREN,

Defendants.

Case No. 04-CV-12606 (PBS)

FILED
COURT # 6/050
FEE \$ 200.00
12/28/04

MOTION OF PLAINTIFF'S COUNSEL TO ADMIT COUNSEL PRO HAC VICE

Pursuant to Local Rule 83.5.3(b), Plaintiff's undersigned counsel, Joel G. Beckman, hereby respectfully moves the Court to admit David W. Trench, Robert W. Turken, David R. Hazouri, and Scott G. Klein *pro hac vice*, and in support of this Motion, states the following:

1. Mr. Trench is a partner with the firm of Bilzin Sumberg Baena Price & Axelrod LLP, Suite 2500, 200 South Biscayne Boulevard, Miami, Florida 33131, e-mail address: dtrench@bilzin.com, telephone number (305) 350-2359, fax (305) 351-2261, and has been admitted to practice before the following courts:

State of Florida;
U.S. District Court for the Southern District of Florida;
Fifth Circuit Court of Appeals;
Eleventh Circuit Court of Appeals.

2. Mr. Trench is a member in good standing of all courts to which he has been admitted; is eligible to practice before said courts; is not currently suspended, disbarred, or the

subject of any disciplinary proceeding in any jurisdiction; and is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

3. In accordance with Local Rule 83.5.3(b), attached to this Motion is a Certificate signed by Mr. Trench, which confirms the facts set forth in paragraphs 1 and 2 above.

4. Mr. Turken is a partner with the firm of Bilzin Sumberg Baena Price & Axelrod LLP, Suite 2500, 200 South Biscayne Boulevard, Miami, Florida 33131, e-mail address: rturken@bilzin.com, telephone number (305) 350-2381, fax (305) 351-2262, and has been admitted to practice before the following courts:

State of Florida;
U.S. District Court for the Southern District of Florida;
U.S. District Court for the Middle District of Florida;
U.S. District Court for the Northern District of Florida;
Fifth Circuit Court of Appeals;
Eleventh Circuit Court of Appeals.

5. Mr. Turken is a member in good standing of all courts to which he has been admitted; is eligible to practice before said courts; is not currently suspended, disbarred, or the subject of any disciplinary proceeding in any jurisdiction; and is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

6. In accordance with Local Rule 83.5.3(b), attached to this Motion is a Certificate signed by Mr. Turken, which confirms the facts set forth in paragraphs 4 and 5 above.

7. Mr. Hazouri is a partner with the firm of Bilzin Sumberg Baena Price & Axelrod LLP, Suite 2500, 200 South Biscayne Boulevard, Miami, Florida 33131, e-mail address: dhazouri@bilzin.com, telephone number (305) 350-2360, fax (305) 351-2225, and has been admitted to practice before the following courts:

State of Florida;
U.S. District Court for the Southern District of Florida;
State of New York;
U.S. District Court for the Southern District of New York.

8. Mr. Hazouri is a member in good standing of all courts to which he has been admitted; is eligible to practice before said courts; is not currently suspended, disbarred, or the subject of any disciplinary proceeding in any jurisdiction; and is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

9. In accordance with Local Rule 83.5.3(b), attached to this Motion is a Certificate signed by Mr. Hazouri, which confirms the facts set forth in paragraphs 7 and 8 above.

10. Mr. Klein is an associate with the firm of Bilzin Sumberg Baena Price & Axelrod LLP, Suite 2500, 200 South Biscayne Boulevard, Miami, Florida 33131, e-mail address: sklein@bilzin.com, telephone number (305) 375-6147, fax (305) 351-2283, and has been admitted to practice before the following courts:

State of Florida;
U.S. District Court for the Southern District of Florida;
State of Delaware;
U.S. District Court for the District of Delaware;
State of Maryland.

11. Mr. Klein is a member in good standing of all courts to which he has been admitted; is eligible to practice before said courts; is not currently suspended, disbarred, or the subject of any disciplinary proceeding in any jurisdiction; and is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

12. In accordance with Local Rule 83.5.3(b), attached to this Motion is a Certificate signed by Mr. Klein, which confirms the facts set forth in paragraphs 10 and 11 above.

WHEREFORE, Litigation Trustee respectfully requests that David W. Trench, Robert W. Turken, David R. Hazouri, and Scott G. Klein be permitted to practice before this Court in the above-captioned matters.

Respectfully submitted,

SCOTT L. BAENA, LITIGATION TRUSTEE
OF THE LERNOUT & HAUSPIE SPEECH
PRODUCTS N.V. LITGATION TRUST

By his attorneys,



Joel G. Beckman BBO # 553086
William C. Nystrom BBO # 559656
Colleen C. Cook BBO # 636359
Nystrom Beckman & Paris LLP
10 St. James Avenue, 16th Floor
Boston, Massachusetts 02116
Telephone No. (617) 778-9100
Facsimile No. (617) 778-9110

Dated: December 23, 2004

LOCAL RULE 7.1 CERTIFICATION

I, Colleen C. Cook, Esq., of Nystrom Beckman & Paris LLP, hereby certify that on December 23, 2004 I conferred with Sean Knowles, Esq. of Davis Polk & Wardwell, counsel for defendant KPMG LLP, and George A. Salter, Esq. of Hogan & Hartson, LLP, counsel for defendant Klynveld Peat Marwick Goerdeler Bedrijfsrevisoren, concerning this motion and obtained their assent thereto.


Colleen C. Cook

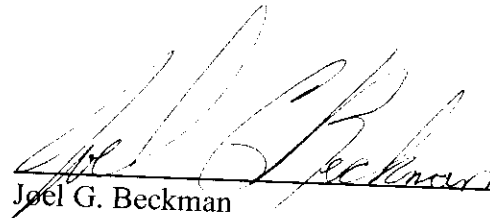
CERTIFICATE OF SERVICE

I, Joel G. Beckman, hereby certify that on December 23, 2004, I caused a true copy of the foregoing document to be served upon the following counsel of record by First Class postage pre-paid mail:

Michael P. Carroll
Michael S. Flynn
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Attorneys for KPMG LLP
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Joel G. Beckman

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MARWICK GOERDELER
BEDRIJFSREVISOREN,

Defendants.

Civil Action No. 04-CV-12606 (PBS)

**CERTIFICATE OF DAVID W. TRENCH IN SUPPORT OF MOTION FOR ADMISSION
PRO HAC VICE**

David W. Trench, duly sworn on oath, states as follows:

1. I am a partner with the firm of Bilzin Sumberg Baena Price & Axelrod LLP, Suite 2500, 200 South Biscayne Boulevard, Miami, Florida 33131, e-mail address: dtrench@bilzin.com, telephone number (305) 350-2359.

2. I am admitted to practice before the following courts:

State of Florida;
U.S. District Court for the Southern District of Florida;
Fifth Circuit Court of Appeals;
Eleventh Circuit Court of Appeals.

3. I am an attorney in good standing and eligible to practice in the above-referenced courts. I have not been suspended or disbarred in any jurisdiction, and no disciplinary actions are pending against me.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 22nd day of December, 2004.



David W. Trench

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Defendants.

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**CERTIFICATE OF ROBERT W. TURKEN IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE**

Robert W. Turken, duly sworn on oath, states as follows:

1. I am a partner with the firm of Bilzin Sumberg Baena Price & Axelrod LLP, Suite 2500, 200 South Biscayne Boulevard, Miami, Florida 33131, e-mail address: rturken@bilzin.com, telephone number (305) 350-2381.

2. I am admitted to practice before the following courts:

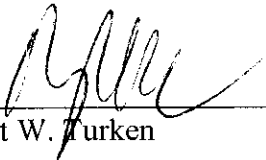
State of Florida;
U.S. District Court for the Southern District of Florida;
U.S. District Court for the Middle District of Florida;
U.S. District Court for the Northern District of Florida;
Fifth Circuit Court of Appeals;
Eleventh Circuit Court of Appeals.

3. I am an attorney in good standing and eligible to practice in the above-referenced courts. I have not been suspended or disbarred in any jurisdiction, and no disciplinary actions are pending against me.

Civil Action No. 04-CV-12606 (PBS)

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 22nd day of December, 2004.



Robert W. Turken

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Defendants.

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**CERTIFICATE OF DAVID R. HAZOURI IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***

David R. Hazouri, duly sworn on oath, states as follows:

1. I am a partner with the firm of Bilzin Sumberg Baena Price & Axelrod LLP, Suite 2500, 200 South Biscayne Boulevard, Miami, Florida 33131, e-mail address: dhazouri@bilzin.com, telephone number (305) 350-2360.


2. I am admitted to practice before the following courts:

State of Florida;
U.S. District Court for the Southern District of Florida;
State of New York;
U.S. District Court for the Southern District of New York.

3. I am an attorney in good standing and eligible to practice in the above-referenced courts. I have not been suspended or disbarred in any jurisdiction, and no disciplinary actions are pending against me.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 22nd day of December, 2004.



David R. Hazouri

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**CERTIFICATE OF SCOTT G. KLEIN IN SUPPORT OF MOTION FOR ADMISSION
PRO HAC VICE**

Scott G. Klein, duly sworn on oath, states as follows:

1. I am an associate with the firm of Bilzin Sumberg Baena Price & Axelrod LLP, Suite 2500, 200 South Biscayne Boulevard, Miami, Florida 33131, e-mail address: sklein@bilzin.com, telephone number (305) 375-6147.


2. I am admitted to practice before the following courts:

State of Florida;
U.S. District Court for the Southern District of Florida;
State of Delaware;
U.S. District Court for the District of Delaware;
State of Maryland.

3. I am an attorney in good standing and eligible to practice in the above-referenced courts. I have not been suspended or disbarred in any jurisdiction, and no disciplinary actions are pending against me.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 22nd day of December, 2004.



Scott G. Klein